

THE HONORABLE JUDGE ROBERT S. LASNIK

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

S.L., by and through his parents and
guardians, J.L. and L.L.,

Plaintiff,

v.

PREMERA BLUE CROSS; AMAZON
CORPORATE LLC GROUP HEALTH
AND WELFARE PLAN; and
AMAZON CORPORATE LLC,

Defendants.

Case No.: 2:18-cv-01308-RSL

DECLARATION OF BRODIE DYCHINCO

I, Brodie Dychinco, state as follows:

1. I am Amazon.com's Senior Manager, Health Programs. I am of legal age, am competent to testify, and have personal knowledge of the matters herein.

2. In 2016, the Summary Plan Description for the Premera Standard Plan was the governing plan document for that component of the Amazon Corporate LLC Group Health and Welfare Plan (Plan). There was no separate governing Plan document.

SWORN TO under penalty of perjury under the laws of the United States of America to the best of my knowledge and belief.

DECLARATION OF
BRODIE DYCHINCO - 1

(CASE NO.: 2:18-CV-01308-RSL)

KILPATRICK TOWNSEND & STOCKTON LLP
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1 DATED this 9th of day of August, 2022.

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DECLARATION OF
BRODIE DYCHINCO - 2

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